

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES
CORP.,

Defendant.

Civil Action No. 2:25-cv-00619

JURY TRIAL DEMANDED

DEFENDANT'S NOTICE OF DESIGNATION OF LEAD COUNSEL

COMES NOW, Defendant International Business Machines Corp. ("IBM") hereby notifies the Court and all parties of record that Todd M. Friedman, Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, is designated as lead counsel for Defendant IBM in the above-captioned case.

Dated: July 25, 2025

Respectfully submitted,

/s/ Todd M. Friedman

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on July 25, 2025.

/s/ Todd M. Friedman
Todd M. Friedman